

EXHIBIT 8

Joseph Michael Phillips 3/22/2023

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

EL PHILLIPS)
Plaintiff,) CIVIL ACTION NUMBER
)
) 4:22-cv-184
UNITY COLLEGE)
al.,)
Defendants.)

10 ORAL DEPOSITION OF
11 JOSEPH MICHAEL PHILLIPS
12 MARCH 22, 2023
13 VOLUME 1 OF 1

16 ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS, produced
17 as a witness duly sworn by me at the instance of the
18 Plaintiff, was taken in the above styled and numbered
19 cause on MARCH 22, 2023, from 9:18 AM to 12:42 PM,
20 before Beth Howard, CSR in and for the State of Texas,
21 reported by Machine Shorthand, at Pacific Place, located
22 at 1910 Pacific Avenue, 14th Floor, Conference Room 2,
23 Dallas, Texas, pursuant to the Federal Rules of Civil
24 Procedure, Notice of Deposition, and the provisions
25 stated on the record or attached hereto.

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1 (OATH ADMINISTERED BY THE REPORTER.)

2 JOSEPH MICHAEL PHILLIPS,

3 having been first duly sworn, testified as follows:

4 EXAMINATION

5 BY MR. CRAWFORD:

6 Q. Good morning.

7 A. Good morning.

8 Q. Would you please state your name for the
9 record?

10 A. Joseph Michael Phillips.

11 Q. Dr. Phillips, we are here today to take your
12 deposition.

13 And I want to make sure the one agreement
14 that you and I have as we go forward is that you
15 understand my questions --

16 A. Um-hmm.

17 Q. -- because if you don't understand my
18 questions, you're not able to give your best answers,
19 and that's what we're looking for.

20 So if at any time you don't understand my
21 question or it's confusing or doesn't make sense to you,
22 please let me know, and we'll work through it and -- to
23 make sure that you understand what I'm asking, and then
24 I'll understand what you're answering.

25 A. Okay. Absolutely.

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1 nonresponsive.

2 Q. (BY MR. CRAWFORD) My question was: When you
3 signed this contract, did you say, "I don't understand
4 what 'core values' means because it's vague. Would you
5 please explain it to me?"

6 MR. GREUBEL: Objection, form.

7 A. I would say this: I read it. I had my -- my
8 understanding of the core values, and I have complied
9 with them.

10 Q. (BY MR. CRAWFORD) What is your understanding of
11 the core values?

12 A. Which one?

13 Q. You said that you had your understanding of the
14 core values, so I was asking what your understanding
15 was.

16 A. So, essentially, that you -- you do your duties
17 in the classroom, that you behave with dignity towards
18 the students, you are respectful to people, and that
19 includes, you know, having honest, frank dialogue.
20 That's what I interpreted that as meaning, that you're
21 open with people. You know, that -- I can't remember
22 all of the items. But, I mean, I remember the dignity
23 and respect thing, because it gets repeated a lot at the
24 college.

25 Q. Paragraph 6 provides that the "contract does

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1 Q. How did you -- why did you cite The FIRE.org,
2 then, in your post?

3 A. Well, as you see, I posted the story. They had
4 it on their website.

5 Q. Had you heard of FIRE.org before --

6 A. Yes.

7 Q. -- seeing this?

8 A. I'm sorry. Yeah.

9 Q. Give me some context of that.

10 A. Lora Burnett was represented by them, and so I
11 was friends with Lora Burnett. She had been illegally
12 fired. And she was represented by TheFIRE.org, and she
13 got a settlement. So I was aware of them because of
14 that.

15 Prior to Lora Burnett being represented, I
16 had never heard of the group.

17 Q. Okay. And were you aware of FIRE.org through
18 Dr. Burnett before you made this post?

19 A. Yeah.

20 Q. Okay. Turning to Page 339, the top post says,
21 "Perhaps some local colleges should take a similar step
22 and show some courage, integrity, and treat their
23 community with dignity and respect."

24 Is that your post?

25 A. Yes.

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1 A. Yes.

2 Q. The word "dignity" to you is vague?

3 A. Yeah.

4 Q. And the word "respect" is vague?

5 A. Yeah.

6 Q. Okay. You don't know what those two words

7 mean?

8 A. I know what they mean, but, I mean, those are

9 broad terms. And it's unclear what they mean, because

10 they seem to say that if I speak publicly on a matter of

11 public concern, that's violating dignity and respect,

12 and that's not within my definition.

13 Q. So you don't have a definition of "dignity"?

14 A. Yeah, yeah, that you -- that you behave in a

15 way that communicates that you're aware of the rights of

16 other people. That you -- you're not vulgar. You're

17 not -- you aren't personal in your attacks. That you're

18 not -- you know, that you're -- you are tolerant of

19 other people, and you -- you try to be aware of them.

20 So, yeah, I have that definition, but I

21 don't -- I didn't violate that

22 MR. DAVIS: And I'll object to that last

23 phrase -- or that last part as being nonresponsive.

24 Q. (BY MR. DAVIS) The same with "respect." You

25 understand what that word means, don't you, sir?

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1 UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF TEXAS
3 SHERMAN DIVISION
4 JOSEPH MICHAEL PHILLIPS }
5 Plaintiff, }
6 v. }
7 COLLIN COMMUNITY COLLEGE }
8 DISTRICT, et al., }
9 Defendants. }
10
11 CIVIL ACTION NUMBER
12 4:22-cv-184
13

14 REPORTER'S CERTIFICATION OF
15 ORAL DEPOSITION OF JOSEPH MICHAEL PHILLIPS
16 MARCH 22, 2023

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I, BETH HOWARD, a Certified Shorthand Reporter
in and for the State of Texas, hereby certify to the
following:

That the witness, JOSEPH MICHAEL PHILLIPS, was duly
sworn and that the transcript of the oral deposition is
a true record of the testimony given by the witness;

That pursuant to information given to the deposition
officer at the time said testimony was taken, the
following includes all parties of record and the amount
of time used by each party at the time of the
deposition:

GREG GREUBEL, ESQ. (00 hours, 00 minutes)
Attorney for Plaintiff
CHARLES J. CRAWFORD, ESQ. (02 hours, 52 minutes)
Attorney for Non-Board of Trustee Defendants
ROBERT J. DAVIS, ESQ. (00 hours, 14 minutes)
Attorney for Defendant Board of Trustees

Joseph Michael Phillips 3/22/2023

1 I further certify that I am neither counsel for,
2 related to, nor employed by any of the parties or
3 attorneys in the action in which this proceeding was
4 taken, and further that I am not financially or
5 otherwise interested in the outcome of the action.

6 Certified to by me on this 31st day of March, 2023.

7

8

9

BETH HOWARD, TEXAS CSR 529
EXPIRATION DATE: 4/30/2025
Stormy Jackson Reporting
Firm Registration #610
1518 Clear Creek Drive
Allen, Texas 75002
214.491.0117

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1 REPORTING FIRM FURTHER CERTIFICATION

2 That the deposition transcript was duly submitted on
3 April 3rd, 2023, to Greg Greubel, Esq. for examination,
4 signature and return to Stormy Jackson Reporting by
5 May 6th, 2023;

6 That I am neither counsel for, related to, nor
7 employed by any of the parties or attorneys in the
8 action in which this proceeding was taken, and further
9 that I am not financially or otherwise interested in the
10 outcome of the action.

11 Certified to by me on this 3rd day of
12 April, 2023.

13

14

15 _____
16 /s/ Stormy Jackson_____
17 STORMY JACKSON REPORTING
18 Firm Registration #610
19 1518 Clear Creek Drive
20 Allen, Texas 75002
21 214.491.0117

22

23 19 Taxable cost of deposition transcript: \$1,558.50
24 20 Charged to Mr. Charles Crawford, Attorney for Defendants,
25 21 Collin Community College District, et al.

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